

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: ) Chapter 11  
Legacy IMBDS, Inc., *et al.*,<sup>1</sup> ) Case No. 23-10852 (KBO)  
Debtors. ) (Jointly Administered)  
 ) **Hearing Date: *Only if an objection is filed***  
 ) **Obj. Deadline: Mar. 12, 2024 at 4:00 p.m. (ET)**

**NOTICE OF SEVENTH MONTHLY FEE APPLICATION OF  
MCDERMOTT WILL & EMERY LLP, COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE  
PERIOD FROM JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

**PLEASE TAKE NOTICE** that, on February 20, 2024, the *Seventh Monthly Fee Application of McDermott Will & Emery LLP, Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from January 1, 2024 through January 31, 2024* (the “Application”) was filed with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application or the relief requested therein must be made in accordance with the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [Docket No. 436] (the “Interim Compensation Order”) and must be filed with the Court and served so as to be received by the following parties listed in the Interim Compensation Order no later than **March 12, 2024 at 4:00 p.m. (Eastern Time)**:

- (i) the Debtors, 6740 Shady Oak Road, Eden Prairie, MN 55344-3433, Attn: Alex Wasserburger (awasserburger@imediabrand.com);
- (ii) co-counsel to the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Ryan Preston Dahl (ryan.dahl@ropesgray.com) and Cristine Pirro Schwarzman (cristine.schwarzman@ropesgray.com); Ropes & Gray LLP, 191 North Wacker Drive, 32nd Floor, Chicago, IL 60606, Attn: Stephen L. Iacovo (stephen.iacovo@ropesgray.com); and Pachulski Stang Ziehl & Jones LLP,

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); Legacy IMBDS, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors' service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

919 N. Market Street, 17th Floor, Wilmington, DE 19801, Attn: Laura Davis Jones (ljones@pszjlaw.com) and Timothy P. Cairns (tcairns@pszjlaw.com);

- (iii) the United States Trustee for the District of Delaware, 844 N. King Street, Room 2207, Wilmington, DE 19801, Attn: Richard L. Schepacarter (richard.schepacarter@usdoj.gov);
- (iv) counsel to the Prepetition Agent, Blank Rome LLP, 1201 North Market Street, Suite 800, Wilmington, DE 19801, Attn: Regina Stango Kelbon (regina.kelbon@blankrome.com);
- (v) counsel to Crystal Financial LLC d/b/a SLR Credit Solutions, Morgan Lewis & Bockius, LLP, One Federal Street, Boston, MA 02110, Attn: Julia Frost-Davies (julia.frost-davies@morganlewis.com); and
- (vi) counsel to the Committee, McDermott Will & Emery LLP, One Vanderbilt Avenue, New York, NY 10017-3852, Attn: Kristin Going (kgoing@mwe.com) and Darren Azman (dazman@mwe.com); and McDermott Will & Emery LLP, The Brandywine Building, 1000 N. West Street, Suite 1400, Wilmington, DE 19801, Attn: David R. Hurst (dhurst@mwe.com).

**PLEASE TAKE FURTHER NOTICE** that, if an objection is properly filed and served in accordance with the above procedures, a hearing (the “Hearing”) on the Application will be held at a time and date to be determined before the Honorable Karen B. Owens, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801. Only objections made in writing and timely filed and received will be considered by the Court at such Hearing.

*[Remainder of Page Intentionally Left Blank]*

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE APPLICATION ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER, THE RELIEF REQUESTED IN THE APPLICATION MAY BE GRANTED WITHOUT FURTHER NOTICE OR HEARING.**

Dated: February 20, 2024  
Wilmington, Delaware

**MCDERMOTT WILL & EMERY LLP**

*/s/ David R. Hurst*

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- and -

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